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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

Implementation of the Pay Telephone)
Reclassification and Compensation)
Provisions of the Telecommunications)
Act of 1996)

CC Docket No. 96-128

**MOTION OF THE AMERICAN PUBLIC COMMUNICATIONS
COUNCIL AND THE INMATE CALLING SERVICE PROVIDERS
COALITION TO CONSOLIDATE APPLICATIONS FOR REVIEW
AND TO EXTEND PAGE LIMIT FOR CONSOLIDATED APPLICATIONS**

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May 5, 1997

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Pursuant to Section 1.41 of the Commission's Rules, 47 C.F.R. § 1.41, the American Public Communications Council ("APCC") and the Inmate Calling Service Providers Coalition (the "ICSPC") hereby move for leave (1) to file consolidated applications for review of the Common Carrier Bureau's April 15, 1997 Orders on the Comparably Efficient Interconnection ("CEI") Plans of Ameritech, Bell Atlantic Telephone Companies ("Bell Atlantic"), BellSouth Corporation ("BellSouth"), NYNEX Telephone Companies ("NYNEX"), Pacific Bell and Nevada Bell (jointly, "PacTel"), Southwestern Bell Telephone Company ("SWBT") and U S West, Inc. ("U S West"),¹

¹ See Ameritech's Plan to Provide Comparably Efficient Interconnection to Providers of Pay Telephone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-790, Released April 15, 1997 (CCB) ("Ameritech CEI Order"); Bell Atlantic Telephone Companies' Comparably Efficient Interconnection Plan for the
(Footnote continued)

and (2) to exceed, if necessary, the 25-page limit for applications for review, 47 C.F.R. § 1.15(f)(1). Under this motion, APCC and ICSPC each would file their own application for review. Each party's application for review would address all seven (7) of the CEI Orders.

The Commission's CEI Orders share common issues of law. For example, each CEI Order addresses CEI Plan requirements, including unbundling basic services; interface functionality; resale; technical characteristics; installation, maintenance and repair; end user access; CEI availability; minimization of transport costs; and recipients of CEI, and other

(Footnote continued)

Provision of Basic Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-791, Released April 15, 1997 (CCB) ("Bell Atlantic CEI Order"); BellSouth Corporation's Offer of Comparably Efficient Interconnection to Payphone Service Providers, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-792, Released April 15, 1997 (CCB) ("BellSouth CEI Order"); The NYNEX Telephone Companies' Offer of Comparably Efficient Interconnection to Payphone Service Providers, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-793, Released April 15, 1997 (CCB) ("NYNEX CEI Order"); Pacific Bell and Nevada Bell Comparably Efficient Interconnection Plan for the Provision of Basic Telephone Service, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-794, Released April 15, 1997 (CCB) ("PacTel CEI Order"); Southwestern Bell Telephone Company's Comparably Efficient Interconnection Plan for the Provision of Basic Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-795, Released April 15, 1997 (CCB) ("SWBT CEI Order"); U S West's Comparably Efficient Interconnection Plan for Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-796, Released April 15, 1997 (CCB) ("U S West CEI Order"). The Ameritech CEI Order, Bell Atlantic CEI Order, BellSouth CEI Order, NYNEX CEI Order, PacTel CEI Order, SWBT CEI Order and U S West CEI Order are referred to collectively herein as "CEI Orders."

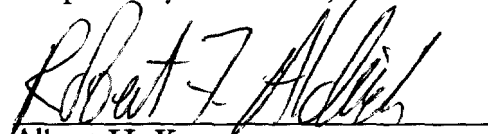
nonstructural safeguards. In fact, the headings used in each CEI Order are virtually the same. APCC and ICSPC each expect to request review of a number of determinations on questions of law that are common to more than one (and in some cases, all) of the CEI Orders. Consolidating the applications for review of each CEI Order would thus eliminate the need for duplicative pleadings on these common issues. Moreover, consolidation would lead to the most effective use of the Commission's limited resources.

Because there are factual variations among the individual CEI Orders, however, APCC and ICSPC each respectfully requests leave to exceed, if necessary, the 25-page limit for applications for review. An extension of the page limit is appropriate to ensure that each party can adequately address the factual issues related to all seven of the CEI plans in one consolidated application for review. APCC and ICSPC each intends to avoid unnecessarily lengthening its filing. In no event will either party require more than 50 pages for its individual application for review of the CEI Orders.

In short, in the interest of efficiency, the Commission should grant APCC and ICSPC each leave to consolidate its pending applications for review of the CEI Orders in one application by each party, and should extend the page limit for each consolidated application for review to a maximum 50 pages.

Dated: May 5, 1997

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Robert F. Aldrich", written over a horizontal line.

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Certificate of Service

I hereby certify that on May 5, 1997, a copy of the foregoing Motion To Consolidate Its Pending Applications For Review And To Extend Page Limit For Consolidated Application was sent by first class United States mail to the following:

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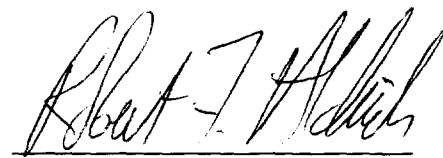
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A handwritten signature in black ink, reading "Robert F. Aldrich". The signature is written in a cursive style with a horizontal line underneath the name.

Robert F. Aldrich